

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

07-CR-131 WMS

v.

KOLLIN KING,

**SUPPLEMENTAL
AFFIRMATION**

Defendant.

MARYBETH COVERT, affirms under penalty of perjury that:

1. I am an Assistant Federal Public Defender for the Western District of New York and our office was assigned to represent the above-named defendant, Kollin King, on February 2, 2007. I make this supplemental affirmation in support of Mr. King's motion for modification of his conditions of supervised release.

2. United States Probation Officer Alicia Payne has already approved Mr. King's travel request to Florida for February 6 through February 13, 2018. As he disclosed in that travel request, Mr. King is traveling to visit his family in Fort Myers, Florida and will be staying with his aunt, Joyce Hughes, at 2418 LaSalle Avenue, Fort Myers, Florida 33907. He is flying to Florida via Southwest Regional airlines and returning to Buffalo on the same airline.

3. While in Florida, Mr. King will be attending his cousin, Christopher Wittman's wedding.

4. In anticipation of his travel plans, Mr. King already submitted to USPO Payne an approved safety plan for this trip.

5. This is not the first out-of-district travel for Mr. King, but it is his first trip out of New York State since his supervision commenced.

6. For all of his numerous prior approved in-state travel requests, Mr. King similarly submitted safety plans and was monitored by GPS Monitoring by the USPO for those trips.

7. Since this Florida travel was already approved by Probation, the only request of this Court is to lift the GPS monitoring requirement, at probation's suggestion, in order to avoid the continued cumbersome approval process for air travel with such a condition.

8. Based on my conversations with USPO Payne, it is my understanding that each and every time Mr. King has traveled while on supervised release using GPS Monitoring he has indeed been confirmed to be located at the places he had approval to be at and at the specified times for travel.

9. There is no indication that Mr. King has violated this or any other of his conditions of supervised release.

10. I have spoken with Assistant United States Attorney Aaron Mango who indicates that the Government opposes this modification of conditions.

WHEREFORE, the defendant respectfully requests a modification of his special conditions of supervision to remove the GPS monitoring requirement.

DATED: Buffalo, New York, January 30, 2018

Respectfully submitted,

/s/ MaryBeth Covert

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TO: Aaron Mango
Assistant United States Attorney

Alicia Payne
U.S. Probation Officer